DATE OUT: May 9, 1995

PRODUCT CHEMISTRY REVIEW OF an EP SUBJECT:

DP BARCODE No.: D208774 File Symbol No.: 10182-GIL

PRODUCT NAME: Promexal X 50 Preservative

TO: Marion Johnson, PM #31

> Antimicrobial Program Brnach Registration Division (7505C)

Treva C. Alston, Chemist Dreva G. alsten FROM:

Product Chemistry Review Section Registration Support Branch Registration Division (7505W)

THRU: Harold Podall, Section Head

MP 51818T. Product Chemistry Review Section Registration Support Branch Registration Division (7505W)

## SUMMARY OF FINDINGS:

This submission is for the registration of an end use product for use as an industrial preservative. This is an integrated formulation. Data for the Technical Ingredient submitted in Grade Active was registration package. Product chemistry requirements for Series 61, 62, & 63 of the Pesticide Assessement Guidelines have been fulfilled. However, before this product may be registered, data must be submitted to the Agency for an inert used in the formulation in order to determine if it is approved for use. (See Confidential Appendix for this discussion).

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(GRAS).

1.	Reviewer: Treva C. Alston 2. Company: Zeneca, Inc.
3.	Type of Submission: Registration [x] Reregistration [] New [x] Resubmission [] Amendment [] "ME-TOO" [] Alternate Formulation [] Experimental Use Permit [] Other (Specify)
4.	If "Me-TOO" Registration, this product is [] is not [] similar or substantially similar to EPA's Reg. No.:
	If not, comment in Confidential Appendix A on the differences between the registered and the new source where significant.
CONF	IDENTIAL STATEMENT OF FORMULA
5.	Type of formulation and the sources of active ingredients:
	<ul> <li>Non-integrated formulation system</li></ul>
	• Integrated formulation system[x]
6.	Clearance of intentionally added ingredients in the formulation for the intended use (indicate in the Confidential Appendix those that are not cleared; the PC Codes should be provided by the chemist on the CSF for those that are cleared):
6 (a)	Formulation intended for food use under 40CFR§180.1001:  • yes [] • no [] • Some are cleared, others are not [] Cleared under list: • c[] • d[] • e [] Are there any limitations for use as an inert under 40CFR§180.  1001?  • yes [] • no [], If yes, specify
6 (b)	Formulation intended for non-food use: • yes [x] • no [] • Some are cleared, others are not [x]
6 (c)	Clearance by the FDA of certain formulations under 21CFR§170 to 199. Examples: (a) indirect food additives, such as food contact surface sanitizers; adhesives, coatings, paper and paperboard products that may contact food in packaging or holding; and (b) substances generally recognized as safe

- yes ono [] Some are cleared, others are not [] If yes, the entire formulation is cleared under 21CFRS\_\_\_\_\_.
- 7. The density, pH, and flammability values given on the CSF are identical with those of GRN 63-7, 63-12, and 63-15, respectively:

   yes [x]

   no []
- 8. The nominal concentrations (NC) of the active ingredients and the upper and lower certified limits (UCL & LCL) are as follows:

		% by weight		
Active ingredient(s)		NC	UCL	LCL
2-Methyl-4,5-trimethylene- 4-isothiazolin-3-one		5.0	5.25	4.75

- 9. The calculated NCs, based on the pure active ingredients (PAI), are identical to those on the label:

   yes [x]

   no []
- 10. The certified limits are within the standard limits as per 40CFR§158.175 or are adequately explained if different:

   yes [x]

   no []

## PRODUCT LABEL

- 11. The chemical names of the active ingredients on the label are identical to those on the CSF: yes [x] no []
- 12. The appropriate physical and chemical hazards statement regarding flammability or explosive characteristics of the product are given on the label:

   yes [] no [] not applicable [x]
- 13. The storage and disposal instructions for the pesticide and container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses:

  yes [x]
  no []

PRODUCT CHEMISTRY DATA (SERIES 61, 62, 63)

14. Chemical IDs/Manufacture/ Analytical Information		Data Required Fulfilled	MRID No.	
61-1	Chemical Identity	Y	432250-01	
61-2	Starting Materials & Manufact or Formulation Process	Y	432250-01	
61-3	Discussion of Impurities	Y	432250-01	
62-1	Preliminary Analysis	Y	432250-01	
62-2	Certified Limits	Y	431387-01	
62-3	Enforcement Analytical Method	Y	432250-01	

	vsical/Chemical roperties	Data Required Fulfilled	Value or Qualitat. Descrip.	MRID No.	
63-3	Physical State	Y	Liquid	431387- 01	
63-7	Density/Bulk Density	Y	1.02	431387- 01	
63-12	pH of Product	Y	4.3	431387- 01	
63-14	Oxid/Red Action	NA			
63-15 <mark>a</mark>	Flammability-Flash Point (°F or °C)	NA			
63-15b	Flame Extension	NA			
63-16	Explodability	NA			
63-17	Storage Stability	Y	Stable	431387- 01	
63-18	Viscosity	Y	1.444X10 <sub>-3</sub>	431387- 01	
63-19	Miscibility (With Hydrocarbon solvents)	NA			
63-20	Corrosion Characteristics	Y	None	431387- 01	

63-21 Dielectric Breakdown Voltage	NA	
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Rxplanations: Y = The Requirements Were Fulfilled; N = The Requirements Were Not Fulfilled; NA = Not Applicable;
G = Data Gap; U = Requires Upgrading; I = Incomplete or In Progress; W = Waived.
Note to Reviewers: Refer to the instructions for the proper description, e. g., 63-3: emulsifiable concentrate.

## CONFIDENTIAL APPENDIX A

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Reviewer: Treva C. Alston Company: Zeneca, Inc.

For the inert, the registrant must provide the identity of all components, the percentage composition, CAS Registry Numbers and a Material Safety Data Sheet. The technical health and safety data sheet provided in the submission does not fulfill this requirement. Since this is proprietary information, the registrant may request the supplier of this inert to contact EPA directly referencing the File Symbol of the EPA Registration Number in the response.

\*Inert ingredient information may be entitled to confidential treatment\*